

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of)	MM Docket No. 93-89
)	
AURIO A. MATOS)	File No. BPH-911114MS
)	
LLOYD SANTIAGO-SANTOS and LOURDES)	
RODRIGUES BONET)	File No. BPH-911115MP
)	
For Construction Permit for a New)	
Station on Channel 293A in)	
Culebra, Puerto Rico)	

To: Honorable Joseph P. Gonzalez
Administrative Law Judge

PETITION TO ENLARGE ISSUES

AURIO A. MATOS

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His Counsel

Dated: May 14, 1993

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MAY 14 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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To: Honorable Joseph P. Gonzalez
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION TO ENLARGE ISSUES

AURIO A. MATOS ("Matos"), pursuant to Section 1.229(b), hereby petitions the Presiding Judge to enlarge the issues against applicant Lloyd Santiago-Santos and Loudres Rodrigues Bonet ("Santiago and Bonet"),^{1/} to include the following:

a. Whether Santiago and Bonet violated Section 1.65 of the Commission's Rules when they failed to report the broadcast ownership interests of family members, notwithstanding the specific requirement for disclosure on the Form 301 Application.

b. Whether Raúl Santiago is an undisclosed real-party-in-interest in the Santiago and Bonet application.

c. Whether in light of evidence adduced pursuant to the foregoing, Santiago and Bonet are basically qualified to be Commission licensees.

I. SUMMARY

1. FCC Form 301 requires the disclosure of all media interests of immediate members of the family. Matos made all such required disclosures. Santiago and Bonet did not. The Presiding

^{1/} Although the Commission's Hearing Designation Order in this proceeding used the short-form of "Santos and Bonet," it appears to be based upon an incorrect usage of Lloyd Santiago's surname.

Judge should add a reporting issue against Santiago and Bonet.

2. This failure to disclose is all the more significant in that Lloyd Santiago-Santos' father is the source of funds upon which the Santiago and Bonet financial certification is based. Indeed, this link, together with the "family nature" of the other Santiago family ventures raises substantial and material questions of fact about whether Raúl Santiago is a real-party-in-interest in the Santiago and Bonet application.

II. PROCEDURAL MATTERS

A. The Petition Is Timely Filed.

3. Section 1.229(b) of the Commission's Rules will treat as timely petitions to enlarge issues filed "within 30 days after publication of a ... summary of the designation order in the Federal Register." 47 C.F.R. §1.229(b)(2). In this case, the summary of the Hearing Designation Order was filed on April 14, 1993. See, Aurio A. Matos, 58 Fed. Reg. 19434 (Apr. 14, 1993). Hence, this Petition is timely filed on May 14, 1993.

B. Matos' Petition Meets the Threshold Requirements for Requesting Enlargement of Issues.

4. The Petition is supported by facts of which official notice may be taken, specifically facts contained in the Santiago and Bonet Form 301 Application, and other matters contained in the Commission's files. See, Southern Indiana Broadcasting, Ltd. v. F.C.C., 935 F.2d 1340, 1342 (D.C. Cir. 1991) (official notice can be taken of material contained in the Commission files, including the application).

5. Section 309(d) of the Communications Act of 1934, as amended (the "Act") is the basis for the Commission's standards for petitions to enlarge issues under 47 C.F.R. §1.229. Gencom, Inc. v. F.C.C., 832 F.2d 171 (D.C. Cir. 1987). Section 309(d) of the Act specifically allows for the filing of petitions to deny (and, therefore, enlargement of issues) on the basis of facts "of which official notice may be taken..." 47 U.S.C. §309(d)(1). See also, Spanish International Broadcasting Co. v. F.C.C., 385 F.2d 615 (D.C. Cir. 1967) (determination about whether to hold hearing can be made on the basis of facts of which Commission may take official notice).

6. Below, Matos has set forth specific questions of fact so as to demonstrate that grant of the Santiago and Bonet application would not serve the public interest. Thus, it has complied with the statutory conditions of Section 309(d) of the Act. See, Citizens for Jazz on WRVR, Inc., 775 F.2d 392, 394 (D.C. Cir. 1985).

III. FACTS SUPPORTING REQUESTED ISSUES

7. Lloyd Santiago-Santos certified the Santiago and Bonet application on November 14, 1991.^{2/} In response to Section II, Item 8(b), Santiago and Bonet responded that no member of either principal's immediate family had "any interest in or connection

^{2/} See, Santiago and Bonet Form 301 Application, Section VII, Page 25. Matos hereby requests official notice of this fact and all references to the Santiago and Bonet application. Southern Indiana v. F.C.C., supra.

with any other broadcast station..."^{3/} In Section III of the Application, one Raul Santiago Roman was identified as the father of Lloyd Santiago.^{4/}

8. Santiago and Bonet have never amended their application.

9. Similarly, the "Standardized Integration Statement," filed May 5, 1993 by Santiago and Bonet contained no information about any family broadcast interests.

10. Exhibit 1 to this Petition, pp. 2-3, is a true and correct copy of a Form 323 Ownership Report filed on September 29, 1989 with the Commission by Kelly Broadcasting System Corporation ("Kelly"), licensee of radio stations WNIK-AM and WNIK-FM, Arecibo, Puerto Rico. The Form 323 was certified by one Raúl Santiago Santos. Id., p. 2. Mr. Santiago is identified as the President, a Director and 50% shareholder of Kelly. Id., p. 4. The Kelly Ownership Report identifies Héctor Santos Rivera as the Secretary/Treasurer, Director and 50% shareholder of Kelly. Id. Mr. Héctor Santos Rivera gives as his residence an address in Arecibo, Puerto Rico. Id.

11. The transmittal letter for the Kelly Ownership Report was signed by Audrey P. Rasmussen, who is counsel to Santiago and Bonet in this case. (Exhibit 1, p. 1). Certifications filed by Kelly on November 29, 1990 and September 22, 1992 have represented that "there have no changes" in the ownership of Kelly since the filing

^{3/} FCC Form 301, Section II, Item 6(b), page 4.

^{4/} Form 301 Application, Section III, Item 3, page 6.

of the 1989 Form 323 Ownership Report. Id., pp. 5-6.

12. Exhibit 2 to this Petition, pp. 1-3, is a true and correct copy from the Commission's files of the Form 323 Ownership Report for Aurora Broadcasting Company ("Aurora"), permittee of AM station WMSW, Hatillo, Puerto Rico. One Zaida Santos Rivera executed the Ownership Report on behalf of Aurora. Id. Ms. Rivera is also identified as the President, a Director and 45% owner of Aurora. Id., p. 2. Héctor Santiago Santos, also of Areçibo, is the Secretary, a Director and 45% owner of Aurora. Id. On March 3, 1989, Aurora certified to the Commission that there had been no change in its ownership. Id., pp. 4-5. Ms. Rasmussen signed the transmittal letter for that certification. Id., p. 4. a) Raúl Santiago, the President of Kelly, is the father of Lloyd Santiago. Zaida Santos, President of Aurora, is his mother. Exhibit 3 contains a certified copy of the Certificate of Birth ("Certificación De Nacimiento") of Lloyd Manuel Santiago Santos. The Certificate states that his father's name is Raúl Santiago. Id. Lloyd Santiago Santos' mother is identified as Zaida Santos. Id.

13. Héctor Santiago Santos, the Secretary/Treasurer of Kelly and the Secretary and 45% owner of Aurora, is Lloyd Santiago's brother. Exhibit 4 contains a certified copy of the Certificate of Birth of Hector Loyd Santiago Santos and identifies as his parents Raul Santiago and Zaida Santos.

14. The 1991 directory of the Puerto Rico Broadcasters Association ("Asociación De Radiodifusores De Puerto Rico"), page

89, identifies Aurora as the corporate owner of WMSW ("Nombre Corporativo") and Zaida Santos Rivera as the President. (Exhibit 5). It also identifies Lloyd M. Santiago, the applicant principal of Santiago and Bonet, as the Sales Manager ("Gerente Comercial") of WMSW. Id.

15. The Santiago and Bonet application represents that Santiago and Bonet are relying upon Raúl Santiago, Lloyd Santiago-Santos' father, to provide \$30,000 of the estimated \$125,000 necessary to construct the Santiago and Bonet station at Culebra.^{5/}

16. The Aurora station is not the only Santiago family venture. Exhibit 6 hereto is a copy of the Editorial and Ownership Information from the weekly newspaper "El Periódico Del Norte," from the issue of May 6-12, 1993. The document represents that Lloyd Santiago is the Sales Manager and Lourdes Rodríguez the Credit Manager. Id.^{6/} The Editor-In-Chief ("Director-Editor") is Lloyd Santiago's brother, Manolo Santiago. See, Exhibit 7 hereto.

17. Finally, Exhibit 8 hereto is the "Declaration of Aurio M. Matos."^{7/} Therein, Mr. Matos recounts that on Wednesday, May 5, 1993, Mr. Matos travelled to Santurce to meet with Carlos J. Colon Ventura, President of radio station WAPA, Matos' proposed

^{5/} Form 301 Application, Section III, Item 3, page 6.

^{6/} ~~Santiago and Bonet first disclosed this newspaper ownership~~

transmitter site. Id. Mr. Matos recounts that when he arrived at WAPA, Lloyd Santiago-Santos was leaving Mr. Colon Ventura's office, accompanied by Raúl Santiago. Id. Mr. Matos states that when he inquired of Mr. Colon Ventura why the Santiagos had visited him, Mr. Colon Ventura replied that they had met with him to inquire about the use of the WAPA tower as an antenna site and the terms and conditions under which it would be available to Santiago and Bonet. Id. Lourdes Rodríguez Bonet was not present at the meeting with Mr. Colon Ventura. Id.

IV. ARGUMENT

A. Substantial Questions Of Material Fact About The Failure To Report The Santiago Family Media Interests Require Specification Of A Section 1.65 Issue.

18. The failure to disclose the existence of broadcast station interests of immediate family members violates Section 1.65(a) of the Commission's Rules. 47 C.F.R. §1.65(a). Applicants have a duty to report such information inasmuch as Form 301 expressly requires such information. Evergreen Broadcasting Company, 7 FCC Rcd 6601, 6605 (¶ 23) (1992).

19. In Merrimack Valley Broadcasting, Inc., 99 FCC 2d 680 (1984), the Commission concluded that the failure to report family media interests raised a question of whether an applicant had been negligent or inattentive to reporting rules or lacking in candor. Id., at 683 (¶ 7). The Santiago-Santos family, including Lloyd Santiago, are experienced broadcasters. They are presumptively aware of the rules and regulations of the Commission, including rules governing reporting of media interests. Members of the

Santiago-Santos family are longtime owners of several radio stations in Puerto Rico. Thus, this reporting failure should not be dismissed as a trivial matter. Santiago and Bonet are not "babes in the woods" in matters related to the Commission.

20. Certainly, Lloyd Santiago was aware of the family ownership in the Aurora station. Lloyd Santiago-Santos was the General Manager of Aurora's station until at least 1991, when Santiago and Bonet filed their application. See, "Standardized Integration Statement," p. 2. The Puerto Rico Broadcasters Association still lists him as the General and Sales Manager for the Aurora stations.

21. As additional evidence that the failure to report was not inadvertent, it is significant that the Kelly and Aurora stations are represented by the same legal counsel as Santiago and Bonet.

22. Santiago and Bonet have a motive for concealing the family media ownership interests. Raúl Santiago, Lloyd Santiago-Santos' father, is a source of a considerable portion of the financial resources upon which Santiago and Bonet are relying for their financial certification. Raúl Santiago, a controlling principal of other radio stations, is thus in a position to control the management of the Santiago and Bonet Culiacan station. See

order to explore fully the facts and circumstances which involved this failure to report the Santiago family media interests.

**B. The Motive In Failing To Disclose
Raises Questions About Whether Raúl Santiago Is A
Real-Party-In-Interest In the Santiago And Bonet Application.**

24. Familial relationships, standing alone, do not necessarily raise a presumption of real-party-in-interest status. Llerandi v. F.C.C., 863 F.2d 79 (D.C. Cir. 1988). However, the Commission will "examine such relationships where there are 'close business ties' and the 'independence' of a family member is seriously called into question." Rayne Broadcasting Company, Inc., 5 FCC Rcd 3350, 3352 (¶ 12) (Rev. Bd. 1990), citing Arnold L. Chase, 5 FCC Rcd 1642, 1644 (¶ 12) (1990). See also, Shawn Phelan, 7 FCC Rcd 623 (Rev. Bd. 1992). The Commission scrutinizes "even family relationships to assure the 'independence' of the applicant from non-parties." Cannon's Point Broadcasting Co., 93 FCC 2d 643, 654-56 (Rev. Bd. 1983) (subsequent history omitted).

25. "The Commission's real-party-in-interest inquiry typically focuses on whether a third person 'has an ownership interest, or will be in a position to actually or potentially control the operation of the station.' Astroline Communications Co. Limited Partnership v. F.C.C., 857 F.2d 1556, 1564 (D.C. Cir. 1988) (quoting KOWL, Inc., 49 FCC 2d 962, 964 (Rev. Bd. 1974)) (emphasis supplied).

26. Here, it is conceded by Santiago and Bonet that Raúl Santiago, an experienced broadcaster, is the source of a substantial portion of the funds for their financial certification.

Thus, he is in a position to influence the decisionmaking and control of the Santiago and Bonet station.

27. Further, Mr. Santiago-Santos and Ms. Rodríguez Bonet both have a history of work in Santiago family ventures. See, "Standardized Integration Statement" (Santiago-Santos g.m. for nine years of Aurora, a family controlled station); Exhibit 6 (both employed by family newspaper).

28. Finally, as set forth in the Declaration of Mr. Matos (Exhibit 9), Raúl Santiago accompanied Lloyd Santiago-Santos to meet with the owner of the Matos site to inquire about its use by Santiago and Bonet. In Rayne, the Board concluded that the involvement of a principal's father in the negotiations of site availability was determinative of real-party status. Rayne Broadcasting, supra, 5 FCC Rcd at 3351 (¶ 9).

29. In light of the above, further inquiry is necessary into whether Raúl Santiago is a real-party in the Santiago and Bonet application. The Presiding Judge should grant the Petition and add the requested issues.

WHEREFORE, in light of the foregoing, Matos respectfully requests that the Presiding Judge grant Matos' Petition and specify the requested issues against Santiago and Bonet.^{8/}

Respectfully submitted,

AURIO A. MATOS

By: John B. Kenkel
John B. Kenkel

By: Scott C. Cinnamon
Scott C. Cinnamon
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1901 L Street, N.W.
Suite 200
Washington, D.C. 20036
(202) 659-4401

By: [Signature]

EXHIBIT 1, p. 1

O'CONNOR & HANNAN

ATTORNEYS AT LAW

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WASHINGTON, D.C. 20006-3483

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80 SOUTH EIGHTH STREET
MINNEAPOLIS, MN 55402-2254
(612) 341-3800

DENVER OFFICE
SUITE 4700

Approved by OMB
3080-0010
Expires 04/30/88

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ATIFICATION

EXHIBIT 1, p. 2

United States of America
Federal Communications Commission

SEP 29 1989

I certify that I am

President

(Official title, see Instruction 1)

all contracts and other instructions required to be filed by Section 73.3613 of the Commission's Rules and Regulations. (Only licensees, permittees, or a reporting entity with a majority interest in or that exercises de facto control over the subject licensee or permittee shall respond.)

NONE

Description of contract or instrument	Name of person or organization with whom contract is made	Date of Execution	Date of Expiration

8. List officers, directors, cognizable stockholders and partners. Use one column for each individual or entity. List officers first, then directors and, thereafter, remaining stockholders and partners.

EXHIBIT 1, P. 4

Line (Read carefully - The numbered items below refer to line numbers in the following table.)

1. Name and residence of officer, director, cognizable stockholder or partner (If other than individual also show name, address and citizenship of natural person authorized to vote the stock). List officers first, then directors and, thereafter, remaining stockholders and partners.
2. Citizenship.
3. Office or directorship held.
4. Number of shares or nature of partnership interest.
5. Number of votes.
6. Percentage of votes.
7. Other existing attributable interests in any other broadcast station, including nature and size of such interest.
8. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3565 and 76.501 of the Commission's Rules, including the nature and size of such interests and the position held.

1	(a)	(b)	(c)
	Raúl M. Santiago Santos P O Box 556 Arecibo, PR 00613	Héctor Santos Rivera Urb. San Lorenzo Calle 1-A-0 Arecibo, PR 00612	
2	U.S.	U.S.	
3	President/Director	Secretary/Treasurer	
4	50	50	
5	50	50	
6	50%	50%	
7	None	None	
8	None	None	

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT
AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this Report is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to assess compliance with the Commission's multiple ownership restrictions. The staff, consisting variously of attorneys and examiners, will use the information to determine such compliance. If all the information requested is not provided, processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to retain your authorization.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974,
5 U.S.C. 552(d)(3) AND THE PAPERWORK REDUCTION ACT P.L. 96-611, DECEMBER 11, 1980, 44 U.S.C. 3607.

P. O. Box 556
Arecibo, P. R. 00613



FCC/MELLON OCT 05 1992

EXHIBIT 1, p. 5

TELS. 880-2613
880-2807

OCT 6 12 43 PM '92
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FCC
FEES SECTION

September 22, 1992

Donna Searcy
Secretary
Federal Communications Commission
1919 M Street N W Room 222
Washington DC 20554

RE: WNIK AM/FM
KELLY BROADCASTING SYSTEM CORP.

Dear Ms. Searcy:

This is to confirm that there have been no changes in the above referenced company which holds a license under Part 73 of the FCC Rules from that reported earlier which is currently on file with the Ownership Report, FCC Form 323, as amended from time to time.

This declaration is being provided in lieu of a current Licensee Qualification Report as provided for in Section 73.3615 of the Commission's Rules.

Any questions may be directed to our counsel;

DAVID L HILL
O'CONNOR & HANNAN
1919 PENNSYLVANIA AVENUE N W
SUITE 800
WASHINGTON DC 20006
(202) 887-1431

Very truly yours,

KELLY BROADCASTING SYSTEM CORP

By:

Raúl Santiago Santos

Héctor Santos

wca

JC 10/21/92

P. O. Box 556
Arecibo, P. R. 00613



TELS. 880 - 2613
880 - 2607

November 29, 1990

Donna Searcy
Secretary
Federal Communications Commission
1919 M Street N W Room 222
Washington DC 20554

RE: WNIK AM/FM
KELLY BROADCASTING SYSTEM CORP

Dear Ms. Searcy:

This is to confirm that there have been no changes in the above referenced company which holds a license under Part 73 of the FCC Rules from that reported earlier which is currently on file with the Ownership Report, FCC Form 323, as amended from time to time.


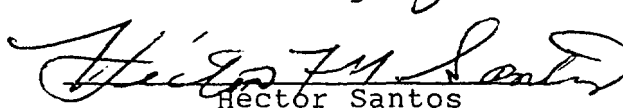
This declaration is being provided in lieu of a current Licensee Qualification Report as provided for in Section 73.3615 of the Commission's Rules.

Any questions may be directed to our counsel:

DAVID L HILL
O'CONNOR & HANNAN
1919 PENNSYLVANIA AVENUE N W
SUITE 800
WASHINGTON DC 20006
(202) 887-1431

Very truly yours,

KELLY BROADCASTING SYSTEM CORP

By: 
Raúl Santiago Santos

Héctor Santos

afm

OC 12/31/90
SC

CERTIFICATION

United States of America
Federal Communications Commission
Washington, D. C. 20554

Ownership Report

NOTE: Before filling out this form, read attached instructions

Section 310(d) of the Communications Act of 1934 requires that consent of the Commission must be obtained prior to the assignment or transfer of control of a station license or construction permit. This form may not be used to report or request an assignment of license/permit or transfer of control (except to report an assignment of license/permit or transfer of control made pursuant to prior Commission consent).

1. All of the information furnished in this Report is accurate as of

September 30, 1988

(Date must comply with Section 73.3615(a), i.e., information must be current within 60 days of the filing of this report, when 1(a) below is checked.)

This report is filed pursuant to instruction (check one)

1 (a) ☒ Annual 1 (b) ☐ Transfer of Control,
Assignment of License or
Construction Permit

for the following stations:

Call Letters	Location	Class of service
WMSW (AM)	Hatillo, P.R.	AM

2. Give the name of any corporation or other entity for whom a separate Report is filed due to its interest in the subject licensee (See instruction 3):

None

3. Show the attributable interests in any other broadcast station of the respondent. Also, show any interest of the respondent, whether or not attributable, which is 5% or more of the ownership of any other broadcast station or any newspaper or CATV entity in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3555 and 76.501 of the Commission's Rules.

None

I certify that I am President

(Official title, see instruction 1)

of Aurora Broadcasting Corporation

(Exact legal title or name of respondent)

that I have examined this Report, that to the best of my knowledge and belief, all statements in the Report are true, correct and complete.

(Date of certification must be within 60 days of the date shown in item 1 and in no event prior to item 1 date):

Jaime A. Remy
(Signature)

Sept. 23 1988
(Date)

(809) 878-0616

Telephone No. of respondent (include area code):

Any person who willfully makes false statements on this report can be punished by fine or imprisonment. U.S. Code, Title 18, Section 1001.

Name and Post Office Address of respondent:

Aurora Broadcasting Corporation
537 Miramar Avenue
Arecibo, Puerto Rico 00612

4. Name of entity, if other than licensee or permittee, for which report is filed (see instruction 3):

DNA

5. Respondent is:

- ☐ Sole Proprietorship
☒ For-profit corporation
☐ Not-for-profit corporation
☐ General Partnership
☐ Limited Partnership
☐ Other:

If a limited partnership, is certification statement included as in instruction

DNA

☐ Yes ☐ No

6. List all contracts and other instructions required to be filed by Section 73.3613 of the Commission's Rules and Regulations. (Only licensees, permittees, or a reporting entity with a majority interest in or that otherwise exercises de facto control over the subject licensee or permittee shall respond.)

DNA

EXHIBIT 2.7.2

Description of contract or instrument	Name of person or organization with whom contract is made	Date of Execution	Date of Expiration

7. Capitalization (Only licensees, permittees, or a reporting entity with a majority interest in or that otherwise exercises de facto control over the subject licensee or permittee shall respond.)

Class of Stock (preferred, common or other)	Voting or Non-voting	Number of Shares			
		Authorized	Issued and Outstanding	Treasury	Unissued
Common	Voting	50	50	0	0

Remarks concerning family relationships attribution exemptions and certifications: (See Instructions 4, 5 and 6)

(Read carefully - The numbered items below refer to line numbers in the following table.)

EXHIBIT 2, p. 3

1. Name and residence of officer, director, cognizable stockholder or partner (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List officers first, then directors and, thereafter, remaining stockholders and partners.
2. Citizenship.
3. Office or directorship held.
4. Number of shares or nature of partnership interest.
5. Number of votes.
6. Percentage of votes.
7. Other existing attributable media interests subject to the multiple ownership restrictions of Sections 73.3555 and 76.501 of the Commission's Rules, including nature and size of such interest.
8. All other ownership interests of 5% or more, whether or not attributable, as well as any corporate officership or directorship in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3555 and 76.501 of the Commission's Rules, including the nature and size of such interests and the position held.

1	(a) Zaida Santos Rivera Arecibo, Puerto Rico	(b) Hector Santiago Santos Arecibo, Puerto Rico	(c) Miguel Angel-Garcia Hatillo, Puerto Rico
2	U.S. Citizen President/Director	U.S. Citizen Secretary/Director	U.S. Citizen Director

EXHIBIT 2, p. 4

O'CONNOR & HANNAN
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VELAZQUEZ, 21
MADRID 1, SPAIN

MURPHY DE LOACH

EXHIBIT 2, p. 5

WMSW
P. O. Box 1652
Arecibo, P. R. 00613



(809) 879-4094
788-4613
898-5032
898-3900

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MAR 3 - 1989

Federal Communications Commission
Office of the Secretary
FEBRUARY 15, 1989.

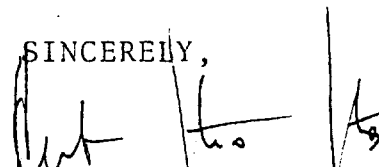
O'CONNOR & HANNAN
ATT. DAVID HILL/ AUDREY RASMUSSEN
1919 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006-3483

SIRS:

IN LIEU OF A FORM 323, WE ARE SUBMITTING HERewith, THE FOLLOWING
STATEMENT:

DURING THE PAST CALENDAR YEAR 1988-89 THERE HAS BEEN NO CHANGE IN
THE OWNERSHIP REPORT OF RADIO STATION WMSW- ASSIGNED TO HATILLO, P.R.

SINCERELY,


HECTOR SANTIAGO SANTOS
SECRETARY & TREASURER
AURORA BROADCASTING, CORP
BOX 1652
ARECIBO, P.R. 00613

3-8-89

